

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LUCY WASHINGTON

Plaintiff,

V.

CARLY CERVANTEZ #8761,
RENATA KLEPACKI #12848,
and CITY OF CHICAGO
Defendants.

No. 1:24 cv 12842

Hon. Chief Judge Virginia M. Kendall

**PLAINTIFF’S PETITION FOR RULE TO SHOW CAUSE AGAINST COOK COUNTY
STATES ATTORNEYS OFFICE AND/OR REPRESENTATIVES**

NOW COMES the Plaintiff, Lucy Washington, by and through counsel, Brandon Brown, The Brown Law Ltd., and moves this Honorable Court to issue a Rule to Show Cause as to why the Cook County State's Attorney's Office and/or its representatives should not be held in contempt of court for their failure to produce records in response to a lawfully issued subpoena for records. In support of this petition, Plaintiff states as follows:

1. This cause of action arises from a complaint for misconduct alleged to have been committed by the Defendants, to the harm and detriment of the Plaintiff Lucy Washington. (See Dkt. 3)
2. The alleged misconduct took place in December of 2023. The respondent Cook County States Attorney's Office and/or its personnel are witnesses to the alleged misconduct.
3. In December of 2023, the Cook County States Attorney's Office and/or its personnel created, maintained and stored, documents, records and other tangible items that relate critically to the subject matter of this complaint.

4. On May 28, 2025, personnel from the Cook County States Attorney's Office were served with a subpoena for records. Personnel from the Cook County States Attorney's Office affixed the subpoena with a file stamped receipt. (See Exhibit 1)
5. The subpoena requested the production of records on or before June 30, 2025. (See Exhibit 1, page 1)
6. On August 13, 2025, personnel from the Cook County States Attorney's Office contacted the Plaintiff and provided a protective order that would specifically govern any records produced by their office and further requested the entry of the order. On August 18, 2025, this Court entered the respondent's order. (See Dkt. 34)
7. As of the filing of this petition, the Plaintiff still seeks and requires a substantial number of relevant documents, materials and tangible items, that were requested in the Plaintiff's subpoena, despite complying with the Respondent's requests.
8. The Plaintiff has conferred with representatives from the Cook County States Attorney's Office specialized discovery section. The representatives provided they have been exercising their best efforts to locate the requested file and would continue to look.
9. The Plaintiff notes that at the time the Cook County States Attorney's Office received the subpoena, only 17 months had elapsed between the disposition of the prosecution of Lucy Washington and the May 28, 2025, receipt of service.
10. At the time of the filing of this petition, the Cook County State's Attorney's Office has failed to comply and produce the records requested in the Plaintiff's subpoena.
11. Considering the recency in time of the materials requested, and the imminent discovery deadlines set by this Court, the Cook County States Attorney's Office leaves the Plaintiff with no alternative other than to ask this Court to issue a Rule to Show Cause *Instante*

against the Respondents Cook County State's Attorney Office to show cause as to why they should not be held in contempt of court.

WHEREFORE the Plaintiff, Lucy Washington, respectfully prays as follows: That this Honorable Court issue a Rule to Show Cause *Instanter* against the Respondents Cook County State's Attorney's Office as to why they should not be held in Contempt of this Court for their failure to comply with the properly issued and served subpoena and for any other relief, this Honorable Court deems equitable and just.

Dated: September 26, 2025

Respectfully Submitted,

By: /s/ Brandon Brown
Plaintiff's Attorney

THE BROWN LAW LTD.
4455 S. King Drive
Suite 100A
Chicago, Illinois 60653
T: (773) 624-8366
F: (773) 624-8365
E: bbrown@thebrownlaw.com

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies, on oath, that the foregoing, PLAINTIFF'S PETITION FOR RULE TO SHOW CAUSE AGAINST COOK COUNTY STATES ATTORNEY'S OFFICE AND/OR REPRESENTATIVES, was served on all counsel of record via the Court's electronic filing system or CM/ECF on:

on Friday, September 26, 2025.

/s/Brandon Brown